

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JILL BABCOCK, et al.,  
Plaintiffs,  
v.

Case No.: 2:22-cv-12951  
JUDGE JONATHAN J.C. GREY

STATE OF MICHIGAN, et al.,  
Defendants.

**PLAINTIFFS' EXPERT WITNESS DISCLOSURES**

Plaintiffs Jill Babcock, Marguerite Maddox, and Ashley Jacobson, by counsel, hereby submit their expert witness disclosures pursuant to Fed. R. Civ. P. 26(a)(2)(A).

1. Gary L. Talbot  
6032 Carbury Dr.  
Jackson, MI 49201  
(734) 649-1311
2. Any necessary rebuttal witnesses.

Mr. Talbot's expert witness report is being provided to Defendants' counsel via email.

Plaintiffs reserve the right to supplement this list as information about Plaintiffs' claims and/or Defendants' defenses becomes known throughout the course of investigation and discovery.

Dated: February 10, 2025

Respectfully Submitted,

/s/ Michael W. Bartnik

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*Attorneys for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I, Michael W. Bartnik, counsel for Plaintiffs, certify that on February 10, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

/s/ Michael W. Bartnik

MICHAEL W. BARTNIK (P32534)

